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8 **Attorneys for Plaintiff,**
9 **BIG ROCK ASSETS MANAGEMENT, LLC**

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 **BIG ROCK ASSETS MANAGEMENT LLC, a**
13 **Nevada limited liability company,**

14 **Plaintiff**

15 **v.**

16 **NATIONAL DEFAULT SERVICING**
17 **CORPORATION, BANK OF AMERICA, a**
18 **National Association; DOES I-X; Inclusive**

19 **Defendants**

20 **CASE NO.: 2:22-cv-00909-CDS-DJA**

21 **(Removed from Eighth Judicial District of**
22 **Nevada, Case No. A-22-852207-C)**

23 **STIPULATION AND ORDER TO EXTEND**
24 **TIME TO RESPOND TO BANK OF**
25 **AMERICA, N.A.'S MOTION TO DISMISS**
26 **COMPLAINT**

27 **Big Rock Assets Management, LLC ("Plaintiff") and Bank of America, N.A. ("BANA")**
28 **stipulate that Plaintiff shall have up to and including **December 15, 2022**, to file its response to Bank**
of America, N.A.'s Motion to Dismiss Complaint, which is currently due on November 28, 2022.

Good cause exists to grant this extension. This is Plaintiff's first request for an extension. The
proposed extension only seeks an additional 17 days from the current deadline. Settlement discussions
remain ongoing that could resolve this action and several other pending actions in this court and in
state court. Incurring fees related to a response may effect the settlement, especially if a response is
not necessary.

This is the parties' first request for an extension of this deadline and is not intended to cause any delay or prejudice to any party.

DATED this 15th day of November, 2022.

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<u>/s/ Scott R. Lachman</u>	<u>/s/ Andrew A. Bao</u>
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IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
 Case No.: 2:22-cv-00909-CDS-DJA

DATED: November 16, 2022